



**County of Kaua`i
Information Privacy Plan
December 1, 2008**

PLAN SUBMITTED BY THE COUNTY OF KAUA`I TO THE INFORMATION PRIVACY AND SECURITY COUNCIL ESTABLISHED BY ACT 10, SESSION LAWS HAWAI`I, 2008.

In accordance with Act 10, SLH 2008, the County of Kaua`i submits this plan regarding the protection of an individual's personal information collected, used and maintained by the County of Kaua`i and related agencies, boards, and commissions.

I. History

The County of Kaua`i is developing and implementing a compliance plan to protect personal information. The plan includes identifying all relevant laws, completion of a Personal Information Inventory within all departments, and development of a Document Destruction Policy.

The compliance plan was intended to meet all existing and anticipated regulations pertaining to the security of personal information maintained by the County of Kaua`i.

II. Current practices are reflected bellow:

- A. Responsible for the governance and policy management are the following: Director of Finance, Information Technology Communications and Projects Manager, and County of Kaua`i Personal Information Compliance Team.
- B. Administrative safeguards - Developed and implemented the County of Kaua`i Document Destruction Policy and Computer, Email, and Internet Usage Policies.
- C. Physical safeguards - Reinforcements have been made regarding security practices such as visitor logs and restricted access to computer network infrastructure.
- D. Technical safeguards - Deployment of technical measures that includes firewalls, anti-virus software, and web content filtering solutions.

III. Internal and external access to personal information maintained by the County of Kaua`i as described below:

- A. Role based access - Access to the County of Kauai's network, software applications and personal information are based on job duties.
- B. Contracts, Memorandum of Agreements (MOAs)/Memorandum of Understandings (MOUs) - All external access to the county's network and personal information have contractual obligations

and technical measures such as VPN to protect the exchange of confidential information.

- C. Training - All individuals authorized to access the County of Kauai's computer network are provided training on the county's security policies and procedures.

IV. Identification of County of Kaua`i Systems containing Personal Information

The County of Kaua`i, pursuant to HRS 487, is compiling data on its systems that contains an individual's personal information.

V. The County of Kaua`i's plan to reduce the unnecessary collection and use of personal information are as follows:

A. The County of Kauai plans to:

1. Continue to review and reduce the use of the full 9 digit SS# to 4 digits in computer systems maintained by the county.
 2. Will review all paper documents and notices for the necessary use of the 9 digit SS#.
- B. Conduct periodic reviews of systems that contain SS#.
 - C. Conduct periodic reviews of access permissions and control to minimize access to personal information such as SS#.
 - D. Develop a directory of all County of Kaua`i agencies affected.
 - E. Inform all County of Kaua`i agencies of personal information responsibilities.
 - F. Collect all related legislation.
 - G. Document all Personal Information Inventory results.
 - H. Consider adding to the Destruction Policy personal information shredded rubbish handling must be 'AAA' certified.
 - I. Create a data room or document library using Sharepoint.
 - J. Draft and finalize Personal Information Policy.